

Robert L. Rimberg
Joel S. Schneck
GOLDBERG & RIMBERG PLLC
115 Broadway, 3rd Floor
New York, NY 10006
(212) 697-3250
jss@grlawpllc.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEWYORK**

In re:

GERSHON BARKANY

Alleged Debtor

Case No. 8-14-72941-las

Chapter 7

DECLARATION OF JOEL S. SCHNECK

Joel S. Schneck hereby declares as follows:

1. I am a member of Goldberg & Rimberg, PLLC, attorneys for creditors, Canadian Northern Realty LLC, Canadian Northern Realty LLC, on behalf of its members, Metro Equity Holdings LLC, 169 16TH Street LLC, Abraham Loffler, WLCF Metro Equity Holdings LLC, WL Metro Holdings LLC, Law Offices of Allan Lebovits, as nominee, L'Chayim Foundation, Inc., David Weinberger, Refoel Lebracht and Ludvik and Eva Hilman Family Partnership, L.P.

2. We have reviewed the motion to dismiss submitted by Barkany Asset Recovery and Management LLC and wholly support and join in the arguments and factual assertions contained therein.

3. Our clients were the victims of the second 2013 fraudulent scheme by the Debtor, suffering damages in an amount not less than \$7,500,000.

4. As of the petition date, our clients had commenced two law suits against parties who are alleged to have knowingly received our clients' assets:

(a) Canadian Northern Realty LLC, et al., v. Gershon Barkany a/k/a Gary Barr; Alan Gerson; Jason Rosenthal; Alfred Schonberger; Marina Development Company, LLC; Old World Investments; Sam Sprei; Johnathan Zelinger; Joseph Rosenberg; First American Title Insurance Corp.; Bruce Montague & Partners; and Morrison and Foerster, Index No.: 501806/2013

(b) Ludvik and Eva Hilman Family Partnership, L.P. v. Alan Gerson, Esq., Bruce Montague & Partners and Gershon Barkany a/k/a/ Gershon S. Barkany a/k/a Gary Barr, Index No.: 502113/2013.

5. Petitioning creditors, Joseph Rosenberg and Marina Development Company, LLC are defendants in those actions.

6. We hope that the Court will dismiss the bankruptcy as an improper attempt by the petitioning creditors to avoid their liability for their roles in the frauds and receipt of our clients' monies *vis a vis* the Debtor.

I declare under penalty of perjury that the following is true and correct.

New York, New York
September 9, 2014

/S/ Joel S. Schneck
Joel S. Schneck
GOLDBERG & RIMBERG PLLC
Attorneys for Creditors
Canadian Northern Realty LLC, Canadian Northern Realty LLC. On behalf of its members, Metro Equity Holdings LLC, 169 16TH Street LLC, Abraham Loffler, WLCF Metro Equity Holdings LLC, WL Metro Holdings LLC, Law Offices of Allan Lebovits, as nominee, L'Chayim Foundation, Inc., David Weinberger, Refoel Lebracht and Ludvik and Eva Hilman Family Partnership, L.P
115 Broadway, Suite 302
New York, NY 10006

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